Robert Wolf, Esq. (rwolf@mosessinger.com)
Robert D. Lillienstein, Esq. (rlillienstein@mosessinger.com)
Jordan Greenberger, Esq. (jgreenberger@mosessinger.com)
MOSES & SINGER LLP
The Chrysler Building
405 Lexington Avenue
New York, New York 10174
Tel: (212) 554-7800

Fax: (917) 206-4307 Attorneys for Defendants

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

4 K & D CORPORATION d/b/a GRAND ESTATES AUCTION COMPANY, JOHN BLOESER, NANCY BLOESER, DEBORAH JAROL, and SHERWIN JAROL,

Docket No. 13-cv-02527 (JGK)

Plaintiffs,

-against-

CONCIERGE AUCTIONS, LLC, LAURA BRADY, GEORGE GRAHAM, MICHAEL RUSSO, CA PARTNERS, LLC, SEGUE LLC, BRADY HOGAN INVESTMENTS, LLC and JANE DOE 1 10, and ABC CORP. 1-10, The names "John Doe," "Jane Doe" and "ABC Corp." being fictitious and unknown to Plaintiffs,

Defendants.

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the Declaration Of Robert Wolf, dated July 8, 2013, with exhibits, the accompanying supporting memorandum of law, dated July 8, 2013, and all prior proceedings had herein, defendants Concierge Auctions, LLC, Laura Brady, George Graham, Michael Russo, CA Partners, LLC, Segue LLC, and Brady Hogan Investments, LLC, by their attorneys, Moses and Singer LLP, will respectfully move this Court, in Courtroom 12B of the United States Courthouse located at 500 Pearl Street, New York, New York 10007, before the Honorable John G. Koeltl, U.S.D.J., for an Order dismissing the Amended Complaint, filed June 14, 2013 [Doc. 8], of plaintiffs 4 K & D Corporation d/b/a Grand Estates Auction

Company, John Bloeser, Nancy Bloser, Deborah Jarol and Sherwin Jarol, pursuant to Fed. R. Civ. P. 8(a), 9(b), 12(b)(2), 12(b)(4), 12(b)(5) and 12(b)(6).

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's Order filed May 21, 2013 [Doc. 7], Plaintiff's answering papers, if any, shall be served upon the undersigned and filed on or before July 29, 2013.

Dated: New York, New York July 8, 2013

MOSES & SINGER LLP Attorneys for Defendants

By: _____/s/ Robert Wolf, Esq. Robert Lillienstein, Esq. Jordan Greenberger, Esq. The Chrysler Building 405 Lexington Avenue New York, New York 10174 Tel: (212) 554-7800 Fax: (917) 206-4307 rwolf@mosessinger.com rlillienstein@mosessinger.com

igreenberger@mosessinger.com